

Robert Samuel Pimentel
Plaintiff
versus
Charleston County
Snyder, Gordon,
& individual
Defendants

State of South Carolina
Court of Common Pleas
for the Ninth Judicial Circuit

COMPLAINT

Case 9:25-cv-00031-RMG-MHC

VENUE 1 The cause of actions accrued at SACDC where Plaintiff is incarcerated.

FACTS 2 Plaintiff left outgoing mail with Snyder on 02/28/2024. She refused to take it.

3 Plaintiff inquired with Gordon about taking it. He also refused to take it as postage.

4 The manilla envelope addressed to the District Court is still on the guard's desk.

COA 5 Plaintiff adopts by reference the Facts and Exhibits to come later.

42 USC 1983

15-78-105C

6 Defendant's actions constitute mail interference, civil conspiracy, and (gross) negligence (per se).

7 Plaintiff is sustaining damage by the District Court not receiving his mail.

DEMAND Now the Plaintiff demands the Order of the Honorable Court for Mandamus

to make the next available CO take my mail and deposit, if appropriate, into

the outgoing mail, recipient covering the postage, and furthermore,

the Plaintiff Prays for Judgment in his favor for any actual, compensatory,

and/or punitive Relief, and other Relief deemed just and proper by the

trial of fact, including the relief demanded in the Complaints contained within

the manilla envelope Plaintiff purchased from commissary.

COA 8 Plaintiff would also allege an attractive nuisance claim against Charleston County

as it allows to be sold "manilla envelopes" for 50 cents (\$0.50 USD) but

it does not specify that one could not send this envelope as mail.

COA 9 Towards the bottom of the commissary item list, which is fairly long

15 USC 3625

39-5-105C

and requires a significant amount of scrolling to reach, for 85 cents are

"stamped envelopes" which cannot send unfolded average sized paper.

Plaintiff would therefore also argue this violates Consumer Protections,

and Pray for Relief from the Honorable Court, including the 35 cents of

difference per envelope purchased lifetime from 2024/2024 forward,

and lifetime protection from any potential negative judgement

resulting from Plaintiff sending a folded paper, such as this one. Respectfully,

Attest: Robert Samuel Pimentel, per se, SACDC, the 23rd of December, 2024

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